

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DIGISOUND-WIE, INC.,	)	
	)	
Plaintiff,	)	Case No: 07 C 6535
v.	)	
	)	<b>Honorable Judge George W. Lindberg</b>
BESTAR TECHNOLOGIES, INC., DIRK DE	)	
YOUNG, HELENE DE YOUNG, FLORIAN	)	Honorable Magistrate Judge Michael T.
GREILING and LILLI GREILING,	)	Mason
	)	
Defendants.	)	

**DEFENDANTS BESTAR TECHNOLOGIES, INC., DIRK DE YOUNG AND  
HELENE DE YOUNG'S MOTION FOR ENLARGEMENT OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants BESTAR TECHNOLOGIES, INC., DIRK DE YOUNG AND HELENE DE YOUNG, by and through their counsel, Tressler, Soderstrom, Maloney & Priess, LLP, move this Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an enlargement of time to answer or otherwise respond to Plaintiff's Complaint.

1. On November 16, 2007, Plaintiff Digisound-WIE, Inc. filed its Complaint against Defendants BeStar Technologies, Inc. ("BeStar"), Dirk de Young ("D.Young") and Helene de Young ("H.Young") and two other defendants, Florian Greiling and Lilli Greiling. The Complaint alleges claims for: 1) breach of contract by D.Young, 2) breach of fiduciary duty by D.Young and H.Young, 3) trade secret misappropriation against all defendants, 4) violation of the federal Computer Fraud and Abuse Act against all defendants, 5) violation of the federal Lanham Act against all defendants, 6) tortious interference with contract by all defendants, 7) tortious interference with business expectancy by all defendants, and 8) civil conspiracy against all defendants.

2. On November 23, 2007, Defendants BeStar, D.Young and H.Young were served

with summons and the Complaint. On information and belief, the Greilings have not yet been served with summons and the Complaint.

3. Defendants BeStar's, D.Young's and H.Young's answer or responsive pleading to the Complaint is currently due December 13, 2007.

4. In order to review this matter and properly analyze the issues, and in light of the upcoming holiday season, Defendants BeStar, D.Young and H.Young request an extension of time of three weeks in which to file its answer or responsive pleading. Specifically, Defendants request an extension to January 3, 2008.

5. On December 5, 2007, defense counsel for BeStar, D.Young and H.Young conferred with Plaintiff's counsel regarding whether he would agree to their request for a three-week extension. Plaintiff's counsel advised that he would be willing to agree only upon certain conditions relating to expediting discovery in this matter, which Defendants do not agree to at this time.<sup>1</sup>

6. Thus, Defendants BeStar, D.Young and H.Young respectfully request an extension to January 3, 2008, to file their answer or otherwise respond to the Complaint.

WHEREFORE, Defendants BESTAR TECHNOLOGIES, INC., DIRK DE YOUNG AND HELENE DE YOUNG respectfully request that this Court grant their Motion and enter an Order allowing them to answer or otherwise respond to Plaintiff's Complaint by January 3, 2008.

BESTAR TECHNOLOGIES, INC., DIRK DE  
YOUNG and HELENE DE YOUNG

By: /s/ Charmagne Topacio  
One of Their Attorneys

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<sup>1</sup> On November 30, 2007, Plaintiff filed a motion to initiate and expedite discovery. (Dkt. Entry 11.) The Court denied Plaintiff's motion on December 3, 2007, without hearing, as it found the motion to be overly broad and failed to show that good cause existed to order the requested expedited discovery. (Dkt. Entry. 13.)

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2007, I electronically filed **Defendants Bestar Technologies, Inc., Dirk De Young and Helene De Young's Motion for Enlargement of Time To Answer Or Otherwise Respond to Plaintiff's Complaint** with the Clerk of Court using the CM/ECF system, which will send notification of such filings(s) to the following:

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